

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Unbundled Access to Network Elements	)	WC Docket No. 04-313
	)	
	)	
Review of the Section 251 Unbundling	)	WC Docket No. 01-338
Obligations of Incumbent Local Exchange	)	
Carriers	)	

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENTS TO THE

AFFIDAVIT OF

SUSAN M. BALDWIN

on behalf of the

New Jersey Division of the Ratepayer Advocate

September 30, 2004

**FCC CC Docket No. 01-338 and WC Docket No. 04-313**  
**AFFIDAVIT OF SUSAN M. BALDWIN**

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**FCC CC Docket No. 01-338 and WC Docket No. 04-313**  
**AFFIDAVIT OF SUSAN M. BALDWIN**

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**Attachment SMB-1**

**Statement of Qualifications of Susan M. Baldwin**

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Susan M. Baldwin has been actively involved in public policy for twenty-six years, twenty of which have been in telecommunications policy and regulation. Ms. Baldwin is presently an independent consultant. Ms. Baldwin received her Master of Economics from Boston University, her Master of Public Policy from Harvard University's John F. Kennedy School of Government, and her Bachelor of Arts degree in Mathematics and English from Wellesley College.

Ms. Baldwin has extensive experience both in government and in the private sector. Since 2001, Ms. Baldwin has been advising and testifying on behalf of public sector agencies as an independent consultant. In that capacity, she provided comprehensive technical assistance to the Massachusetts Department of Telecommunications and Energy (DTE), serving as a direct advisor in a comprehensive investigation of recurring and nonrecurring costs for unbundled network elements (UNEs). She sponsored testimony in a numbering resource and virtual "NXX" proceeding on behalf of the Iowa Office of Consumer Advocate, on UNE cost studies on behalf of the Illinois Citizens Utility Board, on Qwest's petition to reclassify certain services as competitive on behalf of the Attorney General of the State of Washington, and on CenturyTel's request to raise rates on behalf of the Arkansas Attorney General's Office. She also provided advisory services to the United States General Accounting Office in its preparation of a report on the Internet backbone market.

Most recently, Ms. Baldwin has been working on behalf of consumer advocates in the state *Triennial Review Order* ("TRO") proceedings. She prepared comprehensive testimony analyzing mass market impairment on behalf of the New Jersey Division of the Ratepayer Advocate, the Arkansas Office of the Attorney General, and the Utah Committee of Consumer Services. Testimony was not filed in Arkansas or Utah because of the DC Circuit Court ruling in *USTA v. FCC*, which caused these states to postpone their investigations of impairment.

Ms. Baldwin has testified before the Arkansas Public Service Commission, California Public Utilities Commission, Colorado Public Utilities Commission, Connecticut Department of Public Utility Control, Idaho Public Utilities Commission, Illinois Commerce Commission, Indiana Utility Regulatory Commission, Iowa Utilities Board, Massachusetts Department of Telecommunications and Energy, Nevada Public Service Commission, New Jersey Board of Regulatory Commissioners, Public Utilities Commission of Ohio, Rhode Island Public Utilities Commission, Tennessee Public Service Commission, Vermont Public Service Board, and Washington Utilities and Transportation Commission.

She has also participated in projects in Delaware, the District of Columbia, Hawaii, Illinois, New York, Pennsylvania, and Canada on behalf of consumer advocates, public utility commissions, and competitive local exchange carriers. Ms. Baldwin has served in a direct

advisory capacity to public utility commissions in the District of Columbia, Massachusetts, New Mexico, Utah and Vermont.

Ms. Baldwin worked with Economics and Technology, Inc. for twelve years, most recently as a Senior Vice President. Among her numerous projects were the responsibility of advising the Vermont Public Service Board in matters relating to a comprehensive investigation of NYNEX's revenue requirement and proposed alternative regulation plan. She participated in all phases of the docket, encompassing review of testimony, issuance of discovery, cross-examination of witnesses, drafting memoranda and decisions, and reviewing compliance filings. Another year-long project managed by Ms. Baldwin was the in-depth analysis and evaluation of the cost proxy models submitted in the FCC's universal service proceeding. Also, on behalf of the staff of the Idaho Public Utilities Commission, Ms. Baldwin testified on the proper allocation of US West's costs between regulated and non-regulated services. On behalf of AT&T Communications of California, Inc. and MCI Telecommunications Corporation, Ms. Baldwin comprehensively analyzed the non-recurring cost studies submitted by California's incumbent local exchange carriers.

Ms. Baldwin served as a direct advisor to the Massachusetts Department of Telecommunications and Energy (DTE) between August 2001 and July 2003, in Massachusetts DTE Docket 01-20, an investigation of Verizon's total element long run incremental cost (TELRIC) studies for recurring and nonrecurring unbundled network elements (UNEs). She assisted with all aspects of this comprehensive case in Massachusetts. Ms. Baldwin analyzed recurring and nonrecurring costs studies; ran cost models; reviewed parties' testimony, cross-examined witnesses, trained staff, met with the members of the Commission, assisted with substantial portions of the major orders issued by the DTE; and also assisted with the compliance phase of the proceeding.

Ms. Baldwin has participated in numerous investigations of the impact of proposed mergers of telecommunications carriers on consumers. Ms. Baldwin sponsored testimony on behalf of the Nevada Bureau of Consumer Protection on the proposed merger of Sprint and WorldCom; sponsored testimony on behalf of the Office of Ratepayer Advocates (ORA) of the California Public Utilities Commission and also on behalf of the Washington Office of Attorney General in their respective investigations of the proposed merger of Bell Atlantic Corporation and GTE Corporation; co-managed assistance to the Hawaii Division of Consumer Advocacy in the analysis of the proposed BA/GTE merger; sponsored testimony on behalf of the Ohio Consumers' Counsel and the Indiana Office of Utility Consumer Counselor on the SBC/Ameritech merger; co-sponsored testimony on behalf of the Connecticut Office of Consumer Counsel on the impact of SBC's acquisition of SNET on consumers; co-authored affidavits submitted to the FCC on behalf of consumer coalitions on the SBC/Ameritech and BA/GTE mergers; and co-managed a project to assist the ORA analyze the California Public Utilities Commission's investigation of the merger of Pacific Telesis Group and SBC Communications.

Ms. Baldwin has contributed to the development of state and federal policy on numbering

matters. On behalf of the Ad Hoc Telecommunications Users Committee, Ms. Baldwin participated in the Numbering Resource Optimization Working Group (NRO-WG), and in that capacity, served as a co-chair of the Analysis Task Force of the NRO-WG. She has also provided technical assistance to consumer advocates in the District of Columbia, Illinois, Iowa, Massachusetts, and Pennsylvania on area code relief and numbering optimization measures. Ms. Baldwin also co-authored comments on behalf of the National Association of State Utility Consumer Advocates in the FCC's proceeding on numbering resource optimization.

Ms. Baldwin served four years as the Director of the Telecommunications Division for the Massachusetts Department of Public Utilities (the predecessor to the DTE), where she directed a staff of nine, and acted in a direct advisory capacity to the DPU Commissioners. (The Massachusetts DTE maintains a non-separated staff, which directly interacts with the Commission, rather than taking an advocacy role of its own in proceedings). Ms. Baldwin advised and drafted decisions for the Commission in numerous DPU proceedings including investigations of a comprehensive restructuring of New England Telephone Company's rates, an audit of NET's transactions with its NYNEX affiliates, collocation, ISDN, Caller ID, 900-type services, AT&T's request for a change in regulatory treatment, pay telephone and alternative operator services, increased accessibility to the network by disabled persons, conduit rates charged by NET to cable companies, and quality of service. Under her supervision, staff analyzed all telecommunications matters relating to the regulation of the then \$1.7-billion telecommunications industry in Massachusetts, including the review of all telecommunications tariff filings; petitions; cost, revenue, and quality of service data; and certification applications. As a member of the Telecommunications Staff Committees of the New England Conference of Public Utility Commissioners (NECPUC) and the National Association of Regulatory Utility Commissioners (NARUC), she contributed to the development of telecommunications policy on state, regional, and national levels.

Ms. Baldwin has worked with local, state, and federal officials on energy, environmental, budget, welfare, and telecommunications issues. As a policy analyst for the New England Regional Commission (NERCOM), Massachusetts Department of Public Welfare (DPW), and Massachusetts Office of Energy Resources (MOER), she acquired extensive experience working with governors' offices, state legislatures, congressional offices, and industry and advocacy groups. As an energy analyst for NERCOM, Ms. Baldwin coordinated New England's first regional seminar on low-level radioactive waste, analyzed federal and state energy policies, and wrote several reports on regional energy issues. As a budget analyst for the DPW, she forecast expenditures, developed low-income policy, negotiated contracts, prepared and defended budget requests, and monitored expenditures of over \$100 million. While working with the MOER, Ms. Baldwin conducted a statewide survey of the solar industry and analyzed federal solar legislation.

Ms. Baldwin received Boston University's Dean's Fellowship. While attending the Kennedy School of Government, Ms. Baldwin served as a teaching assistant for a graduate course in microeconomics and as a research assistant for the school's Energy and Environmental Policy Center, and at Wellesley College was a Rhodes Scholar nominee. She has also studied in

Ghent, Belgium.

### **Record of Prior Testimony**

In the matter of the Application of the New Jersey Bell Telephone Company for Approval of its Plan for an Alternative Form of Regulation, New Jersey Board of Regulatory Commissioners Docket No. T092030358, on behalf of the New Jersey Cable Television Association, filed September 21, 1992, cross-examined October 2, 1992.

DPUC review and management audit of construction programs of Connecticut's telecommunications local exchange carriers, Connecticut Department of Public Utility Control Docket No. 91-10-06, on behalf of the Connecticut Office of the Consumer Counsel, filed October 30, 1992, cross-examined November 4, 1992.

Joint petition of New England Telephone and Telegraph Company and Department of Public Service seeking a second extension of the Vermont Telecommunications Agreement, Vermont Public Service Board 5614, Public Contract Advocate, filed December 15, 1992, cross-examined December 21, 1992.

Application of the Southern New England Telephone Company to amend its rates and rate structure, Connecticut Department of Public Utility Control Docket No. 92-09-19, on behalf of the Connecticut Office of Consumer Counsel, filed March 26, 1993 and May 19, 1993, cross-examined May 25, 1993.

In the matter of the Application of Cincinnati Bell Telephone Company for Approval of an Alternative Form of Regulation and for a Threshold Increase in Rates, Public Utilities Commission of Ohio Case No. 93-432-TP-ALT, on behalf of Time Warner AxS, filed March 2, 1994.

Matters relating to IntraLATA Toll Competition and Access Rate Structure, Rhode Island Public Utilities Commission Docket 1995, on behalf of the Rhode Island Public Utilities Commission Staff, filed March 28, 1994 and June 9, 1994, cross-examined August 1, 1994.

In the Matter of the Application of The Ohio Bell Telephone Company for Approval of an Alternative Form of Regulation, Public Utilities Commission of Ohio Case No. 93-487-TP-ALT, on behalf of Time Warner AxS, filed May 5, 1994, cross-examined August 11, 1994.

In Re: Universal Service Proceeding: The Cost of Universal Service and Current Sources of Universal Service Support, Tennessee Public Service Commission Docket No. 95-02499, on behalf of Time Warner AxS of Tennessee, L.P., filed October 18, 1995 and October 25, 1995, cross-examined October 27, 1995.

In Re: Universal Service Proceeding: Alternative Universal Service Support Mechanisms, Tennessee Public Service Commission Docket No. 95-02499, on behalf of Time Warner AxS of Tennessee, L.P., filed October 30, 1995 and November 3, 1995, cross-examined November 7, 1995.

In the Matter of the Application of US West Communications, Inc. for Authority to Increase its Rates and Charge for Regulated Title 61 Services, Idaho Public Utilities Commission Case No. USW-S-96-5, on behalf of the Staff of the Idaho Public Utilities Commission, filed November 26, 1996 and February 25, 1997, cross-examined March 19, 1997.

A Petition by the Regulatory Operations Staff to Open an Investigation into the Procedures and



Methodologies that Should Be Used to Develop Costs for Bundled or Unbundled Telephone Services or Service Elements in the State of Nevada, Nevada Public Service Commission Docket No. 96-9035, on behalf of AT&T Communications of Nevada, Inc., filed May 23, 1997, cross-examined June 6, 1997.

Rulemaking on the Commission's Own Motion to Govern Open Access to Bottleneck Services and Establish a Framework for Network Architecture; Investigation on the Commission's Own Motion into Open Access and Network Architecture Development of Dominant Carrier Networks, California Public Utilities Commission R.93-04-003 and I.93-04-002, co-authored a declaration on behalf of AT&T Communications of California, Inc., and MCI Telecommunications Corporation, filed on December 15, 1997 and on February 11, 1998.

Consolidated Petitions for Arbitration of Interconnection Agreements, Massachusetts Department of Telecommunications and Energy, DPU 96-73/74, 96-75, 96-80/81, 96-83, and 96-84, on behalf of AT&T Communications of New England, Inc. and MCI Telecommunications Corporation, filed February 3, 1998.

In the Matter of the Application of US West Communications, Inc. for Specific Forms of Price Regulation, Colorado Public Utilities Commission Docket No. 97-A-540T, on behalf of the Colorado Office of Consumer Counsel, filed on April 16, 1998, May 14, 1998 and May 27, 1998, cross-examined June 2, 1998.

Joint Application of SBC Communications and Southern New England Telecommunications Corporation for Approval of a Change of Control, Connecticut Department of Public Utility Control Docket No. 98-02-20, on behalf of the Connecticut Office of Consumer Counsel, filed May 7, 1998 and June 12, 1998, cross-examined June 15-16, 1998.

Fourth Annual Price Cap Filing of Bell Atlantic-Massachusetts, Massachusetts Department of Telecommunications and Energy Docket DTE 98-67, on behalf of MCI Telecommunications Corporation, filed September 11, 1998 and September 25, 1998, cross-examined October 22, 1998.

Applications of Ameritech Corp., Transferor, and SBC Communications, Inc., Transferee, For Consent to Transfer Control, Federal Communications Commission CC Docket No. 98-141, co-sponsored affidavit on behalf of Indiana Utility Consumer Counselor, Michigan Attorney General, Missouri Public Counsel, Ohio Consumers' Counsel, Texas Public Utility Counsel and Utility Reform Network, filed on October 13, 1998.

In the Matter of the Joint Application of SBC Communications Inc., SBC Delaware, Inc., Ameritech Corporation and Ameritech Ohio for Consent and Approval of a Change of Control, Public Utilities Commission of Ohio Case No.98-1082-TP-AMT, on behalf of Ohio Consumers' Counsel, filed on December 10, 1998, cross-examined on January 22, 1999.

GTE Corporation, Transferor, and Bell Atlantic Corporation, Transferee, For Consent to Transfer Control, Federal Communications Commission CC Docket No. 98-184, co-sponsored an affidavit on behalf of a coalition of consumer advocates from Delaware, Hawaii, Maine, Maryland, Missouri, Ohio, Oregon, West Virginia, and Michigan, filed on December 18, 1998.

In the Matter of the Joint Application of GTE and Bell Atlantic to Transfer Control of GTE's California Utility Subsidiaries to Bell Atlantic, Which Will Occur Indirectly as a Result of GTE's Merger with Bell

Atlantic, California Public Utilities Commission A. 98-12-005, on behalf of the California Office of Ratepayer Advocate, filed on June 7, 1999.

In the Matter of the Investigation on the Commission's Own Motion Into All Matters Relating to the Merger of Ameritech Corporation and SBC Communications Inc., Indiana Utility Regulatory Commission Cause No. 41255, on behalf of the Indiana Office of Utility Consumer Counselor, filed on June 22, 1999 and July 12, 1999, cross-examined July 20, 1999.

In re Application of Bell Atlantic Corporation and GTE Corporation for Approval of the GTE Corporation - Bell Atlantic Corporation Merger, Washington Utilities and Transportation Commission UT-981367, on behalf of the Washington Attorney General Public Counsel Section, filed on August 2, 1999.

Application of New York Telephone Company for Alternative Rate Regulation, Connecticut Department of Public Utility Control Docket No. 99-03-06, on behalf of the Connecticut Office of Consumer Counsel, filed October 22, 1999.

In re: Area Code 515 Relief Plan, Iowa Utilities Board Docket No. SPU-99-22, on behalf of the Iowa Office of Consumer Advocate, filed November 8, 1999, and December 3, 1999, cross-examined December 14, 1999.

In re Application of MCI WorldCom, Inc. and Central Telephone Company - Nevada, d/b/a Sprint of Nevada, and other Sprint entities for Approval of Transfer of Control pursuant to NRS 704.329, Nevada Public Utilities Commission Application No. 99-12029, on behalf of the Nevada Office of the Attorney General, Bureau of Consumer Protection, filed April 20, 2000.

In re: Area Code 319 Relief Plan, Iowa Utilities Board Docket No. SPU-99-30, on behalf of the Iowa Office of Consumer Advocate, filed June 26, 2000 and July 24, 2000.

In re: Sprint Communications Company, L.P. & Level 3 Communications, L.L.C., Iowa Utilities Board Docket Nos. SPU-02-11 & SPU-02-13, filed October 14, 2002 and January 6, 2003, cross-examined February 5, 2003.

Illinois Bell Telephone Company filing to increase unbundled loop and nonrecurring rates (tariffs filed December 24, 2002), Illinois Commerce Commission Docket No. 02-0864, on behalf of Citizens Utility Board, filed May 6, 2003 and February 20, 2004.

Qwest Petition for Competitive Classification of Business Services, Washington Utilities and Transportation Commission Docket No. 030614, on behalf of Public Counsel, filed August 13, 2003 and August 29, 2003, cross-examined September 18, 2003.

In the Matter of the Application of CenturyTel of Northwest Arkansas, LLC for Approval of a General Change in Rates and Tariffs, Arkansas Public Service Commission Docket No. 03-041-U, on behalf of the Attorney General, filed October 9, 2003 and November 20, 2003.

In the Matter of the Board's Review of Unbundled Network Elements, Rates, Terms and Conditions of Bell Atlantic New Jersey, Inc., New Jersey Board of Public Utilities Docket No. TO00060356, on behalf of the New Jersey Division of the Ratepayer Advocate, filed January 23, 2004.

In the Matter of the Implementation of the Federal Communications Commission's Triennial Review Order, New Jersey Board of Public Utilities Docket No. TO03090705, on behalf of the New Jersey Division of the Ratepayer Advocate, filed February 2, 2004.

*Testimony before State Legislatures:*

Testified on September 24, 1997, before the Massachusetts State Legislature Joint Committee on Government Regulations regarding House Bill 4937 (concerning area codes).

**Publications/Presentations**

Articles on telecommunications and energy policy in trade journals, and presentations at industry associations and conferences include the following:

*Reports:*

"Assessing SBC/Pacific's Progress in Eliminating Barriers to Entry: The Local Market in California Is Not Yet 'Fully and Irreversibly Open'" (with Patricia D. Kravtin, Dr. Lee L. Selwyn, and Douglas S. Williams). Prepared for the California Association of Competitive Telecommunications Companies, July 2000.

"Where Have All the Numbers Gone? (Second Edition): Rescuing the North American Numbering Plan from Mismanagement and Premature Exhaust" (with Dr. Lee L. Selwyn). Prepared for the Ad Hoc Telecommunications Users Committee, June 2000.

"Price Cap Plan for USWC: Establishing Appropriate Price and Service Quality Incentives for Utah" (with Patricia D. Kravtin and Scott C. Lundquist). Prepared for the Utah Division of Public Utilities, March 22, 2000.

"Telephone Numbering: Establishing a Policy for the District of Columbia to Promote Economic Development" (with Douglas S. Williams and Sarah C. Bosley). Prepared for the District of Columbia Office of People's Counsel, February 2000 (submitted to Eric W. Price, Deputy Mayor, April 6, 2000).

"The Use of Cost Proxy Models to Make Implicit Support Explicit, Assessing the BCPM and the Hatfield Model 3.1" (with Dr. Lee L. Selwyn). Prepared for the National Cable Television Association, submitted in FCC CC Docket No. 96-45, March 1997.

"The Use of Forward-Looking Economic Cost Proxy Models" (with Dr. Lee L. Selwyn). Prepared for the National Cable Television Association, submitted in FCC Docket No. CCB/CPB 97-2, February 1997.

"Continuing Evaluation of Cost Proxy Models for Sizing the Universal Service Fund, Analysis of the Similarities and Differences between the Hatfield Model and the BCM2" (with Dr. Lee L. Selwyn). Prepared for the National Cable Television Association, submitted in FCC CC Docket No. 96-45, October 1996.

"Converging on a Cost Proxy Model for Primary Line Basic Residential Service, A Blueprint for Designing a Competitively Neutral Universal Service Fund" (with Dr. Lee L. Selwyn). Prepared for the

National Cable Television Association, submitted in FCC CC Docket No. 96-45, August 1996.

"The BCM Debate, A Further Discussion" (with Dr. Lee L. Selwyn and Helen E. Golding). Prepared for the National Cable Television Association, submitted in FCC CC Docket No. 96-45, May 1996.

"The Cost of Universal Service, A Critical Assessment of the Benchmark Cost Model" (with Dr. Lee L. Selwyn). Prepared for the National Cable Television Association, submitted in FCC CC Docket No. 96-45, April 1996.

"Funding Universal Service: Maximizing Penetration and Efficiency in a Competitive Local Service Environment" (with Dr. Lee L. Selwyn). Prepared for Time Warner Communications, Inc., October 1995.

"A Balanced Telecommunications Infrastructure Plan for New York State" (with Dr. Lee L. Selwyn). Prepared for the New York User Parties, December 4, 1992.

"A Roadmap to the Information Age: Defining a Rational Telecommunications Plan for Connecticut" (with Dr. Lee L. Selwyn, Susan M. Gately, JoAnn S. Hanson, David N. Townsend, and Scott C. Lundquist). Prepared for the Connecticut Office of Consumer Counsel, October 30, 1992.

"Analysis of Local Exchange Carrier April 1988 Bypass Data Submissions" (with William P. Montgomery and Dr. Lee L. Selwyn). Prepared for the National Association of State Utility Consumer Advocates, August 1988.

"Strategic Planning for Corporate Telecommunications in the Post-Divestiture Era: A Five Year View" (with Dr. Lee L. Selwyn, William P. Montgomery, and David N. Townsend). Report to the International Communications Association, December 1986.

"Competitive Pricing Analysis of Interstate Private Line Services." Prepared for the National Telecommunications Network, June 1986.

"Analysis of Diamond State Telephone Private Line Pricing Movements: 1980-1990." Prepared for Network Strategies, Inc., April 1985.

"Analysis of New York Telephone Private Line Pricing Movements: 1980-1990." Prepared for Network Strategies, Inc., February 1985.

#### *Presentations:*

"Impact of Federal Regulatory Developments on Consumers and Consumers' Impact on Regulatory Developments," Presentation for the Washington Attorney General's Office, Seattle, Washington, May 27, 2003.

"The Finances of Local Competition" Presentation at the New England Conference of Public Utilities Commissioners 54th Annual Symposium, Mystic, Connecticut, May 21, 2001.

"Facilities-Based Competition" Presentation at the New England Conference of Public Utilities Commissioners 52nd Annual Symposium, Bretton Woods, New Hampshire, May 24, 1999.

“Exploring Solutions for Number Exhaust on the State Level” and “A Forum for Clarification and Dialogue on Numbering Ideas,” ICM Conference on Number Resource Optimization, December 10-11, 1998.

“Telecommunications Mergers: Impact on Consumers,” AARP Legislative Council 1998 Roundtable Meeting, November 18, 1998

“Consumer Perspectives on Incumbent Local Exchange Carrier Mergers,” National Association of Regulatory Utility Commissioners 110th Annual Convention, November 11, 1998.

Federal Communications Commission En Banc Hearing on “Proposals to Revised the Methodology for Determining Universal Service Support,” CC Docket Nos. 96-45 and 97-160,” June 8, 1998, panelist.

“Universal Service: Real World Applications,” 1997 National Association of State Utility Consumer Advocates Mid-Year Meeting, June 9, 1997.

“Modeling operating and support expenses” and “Modeling capital expenses,” panelist for Federal-State Joint Board on Universal Service Staff Workshops on Proxy Cost Models, January 14-15, 1997, CC Docket 96-45.

“Evaluating the BCM2: An Assessment of Its Strengths and Weaknesses,” presentation to the AT&T Cost Team (with Michael J. DeWinter), December 4, 1996.

“Interpreting the Telecommunications Act of 1996 Mandate for the Deployment of Advanced Telecommunications Services in a Fiscally Responsible and Fully Informed Manner” (with Helen E. Golding), *Proceedings of the Tenth NARUC Biennial Regulatory Information Conference*, Volume 3, September 11-13, 1996.

“Making Adjustments to the BCM2.” Presentation to the Staff of the Federal-State Joint Board on Universal Service, September 16, 1996.

“Converging on a Model: An Examination of Updated Benchmark Cost Models and their Use in Support of Universal Service Funding.” Presentation to the National Association of Regulatory Utility Commissioners Summer Committee Meetings, July 22, 1996.

“The Phone Wars and How to Win Them” (with Helen E. Golding). *Planning*, July 1996 (Volume 62, Number 7).

“ETI's Corrections to and Sensitivity Analyses of the Benchmark Cost Model.” Presentation to the Staff of the Federal-State Joint Board on Universal Service,” May 30, 1996.

“Redefining Universal Service.” Presentation at the *Telecommunications Reports* conference on “Redefining Universal Service for a Future Competitive Environment,” January 18, 1996.

“Funding Universal Service: Maximizing Penetration and Efficiency in a Competitive Local Service Environment,” (with Lee L. Selwyn, under the direction of Donald Shephard), a Time Warner Communications Policy White Paper, September 1995.

“Stranded Investment and the New Regulatory Bargain,” (with Lee L. Selwyn, under the direction of Donald Shephard), a Time Warner Communications Policy White Paper, September 1995.

“New Frontiers in Regulation.” Presentation to the New England Women Economists Association, December 12, 1995.

“Local Cable and Telco Markets.” Presentation at the New England Conference of Public Utilities Commissioners 46th Annual Symposium, June 29, 1993.

“Relationship of Depreciation to State Infrastructure Modernization.” Presentation at the *Telecommunications Reports* conference on “Telecommunications Depreciation,” May 6, 1993.

“Crafting a Rational Path to the Information Age.” Presentation at the State of New Hampshire's conference on the “Twenty-First Century Telecommunications Infrastructure,” April 1993.

“The Political Economics of ISDN,” presentation at the John F. Kennedy School of Government seminar on “Getting from Here to There: Building an Information Infrastructure in Massachusetts,” March 1993.

“ISDN Rate-Setting in Massachusetts.” *Business Communications Review*, June 1992 (Volume 22, No. 6).

“The New Competitive Landscape: Collocation in Massachusetts.” Presentation at TeleStrategies Conference on Local Exchange Competition, November 1991.

“Telecommunications Policy Developments in Massachusetts.” Presentations to the Boston Area Telecommunications Association, October 1989; March 1990; November 1990; June 1992. Presentation to the New England Telecommunications Association, March 1990.

“Tariff Data is Critical to Network Management.” *Telecommunications Products and Technology*, May 1988 (Volume 6, No. 5).

“How to Capitalize on the New Tariffs.” Presentation at Communications Managers Association conference, 1988.

“Auction Methods for the Strategic Petroleum Reserve” (With Steven Kelman and Richard Innes). Prepared for Harvard University Energy Security Program, July 1983.

“How Two New England Cities Got a \$100 Million Waste-to-Energy Project” (with Diane Schwartz). *Planning*, March 1983 (Volume 49, Number 3).

“Evaluation of Economic Development and Energy Program in Lawrence, Massachusetts.” (with Richard Innes). Prepared for U.S. Department of Energy, August, 1982.

“Energy Efficiency in New England's Rental Housing.” New England Regional Commission, 1981.

“Low Level Radioactive Waste Management in New England.” New England Regional Commission, 1981.

“The Realtor's Guide to Residential Energy Efficiency.” Prepared for the U.S. Department of Energy and the National Association of Realtors, 1980.

*Advisor to:*

United States General Accounting Office Report to the Subcommittee on Antitrust, Business Rights and Competition, Committee on the Judiciary, U.S. Senate, *Characteristics and Competitiveness of the Internet Backbone Market*, GAO-02-16, October 2001.

## New Jersey Wire Centers Verizon NJ Contends Are Subject to the Four-Line Carve-Out Rule

### Newark UNE Density Zone 1

Wire Center	CCLI code
Bergen	JRCYNJBR
Elizabeth	ELZBNJEL
Englewood	ENWDNJEN
Hackensack	HCKNNJHK
Journal Square	JRCYNJJO
Leonia	FTLENJLE
Market	NWRKNJ02
Passaic	PSSCNJPS
Rutherford	RTFRNJRU
Union City	UNCYNJ02
Westwood	HLDL NJWE

### Newark UNE Density Zone 2

Wire Center	CCLI code
Metuchen	MTCHNJMT
Morristown	MRTWNJMR
New Brunswick	NBWKNJNB
Plainfield	PLFDNJPF
Ramsey	RMSYNJRM
Ridgewood	RGWDNJRW

### Camden UNE Density Zone 1

Wire Center	CCLI code
Camden	CMDNNJCE

### Camden UNE Density Zone 2

Wire Center	CCLI code
Haddonfield	HDFDNJHD
Laurel Springs	LRSPNJLS
Marlton	MARLNJMA
Merchantville	MHVLNJME
Moorestown	MSTWNJMO

\* Verizon NJ has identified 24 wire centers in New Jersey that it contends are subject to the four-line carve-out. In addition to the 23 within its proposed "relief area" is Somerville (SOVLNJSM).

Sources: "Four or More Lines Carve Out Central Office List for Verizon East" <http://www22.verizon.com/wholesale/local/order/services/?subID=platform-platform#before>. NJ BPU Docket No. TO03090705. Verizon response to RPA-92.



**Price Discrimination Differentiates  
Submarkets within the  
Camden and Newark MSAs**

**UNE Loop Costs Vary by Wire Center**

Density Zone	1	2	3
Wholesale Cost	\$8.12	\$9.59	\$10.92

**Local Exchange Rates Vary by Wire Center**

**Business**

Rate Group	B	C	D
Flat Rate	NA	NA	NA
Message Rate	\$11.76	\$12.77	\$12.96

**Residential**

Rate Group	B	C	D
Flat Rate	\$7.45	\$7.95	\$8.19
Message Rate	\$5.99	\$6.39	\$6.58

Sources: *Wholesale Loop Costs*: Summary Order of Approval, New Jersey Board of Public Utilities Docket No. TO00060356, December 17, 2001, Attachment A.

*Verizon Rate Group B*: Bell Atlantic - New Jersey Inc., Tariff BPU-NJ No. 2, Exchange and Network Services, Sixth Revised, page 31. *Verizon Rate Group C*: Bell Atlantic - New Jersey Inc., Tariff BPU-NJ No. 2, Exchange and Network Services, Seventh Revised, pages 33.

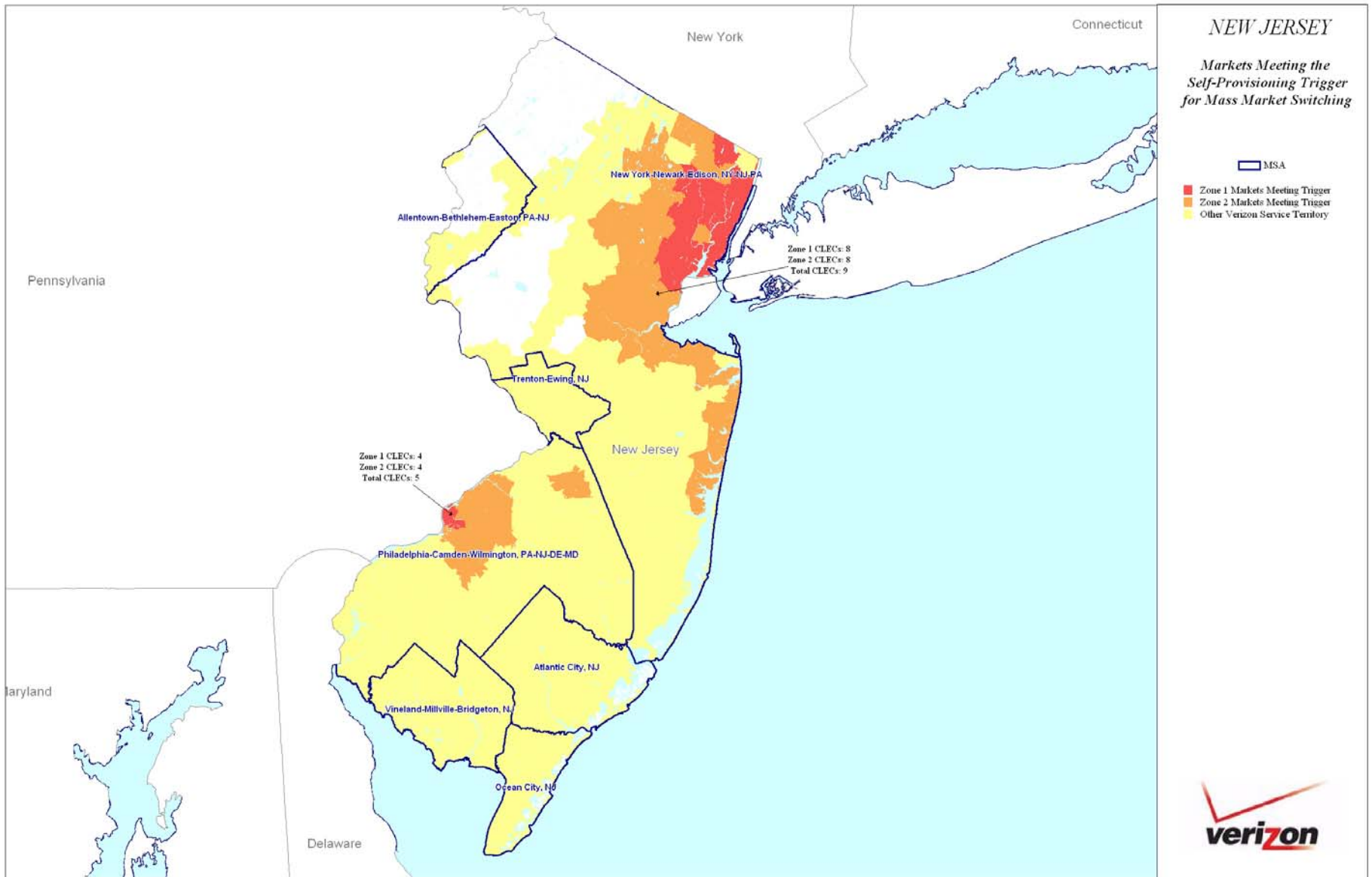
*Verizon Rate Group D*: Bell Atlantic - New Jersey Inc., Tariff BPU-NJ No. 2, Exchange and Network Services, Eighth Revised, page 34. NJ BPU Docket No. TO03090705.

Note: "NA" signifies that the service is not offered.

**Attachment SMB-4**

**Verizon NJ's Proposed Geographic Markets**

**Reproduction of Attachment 3 to West/Peduto Direct Testimony (Verizon NJ)**



ATTACHMENT 3

**Attachment SMB-5**

**Verizon NJ's Response to RPA-TRO-101**

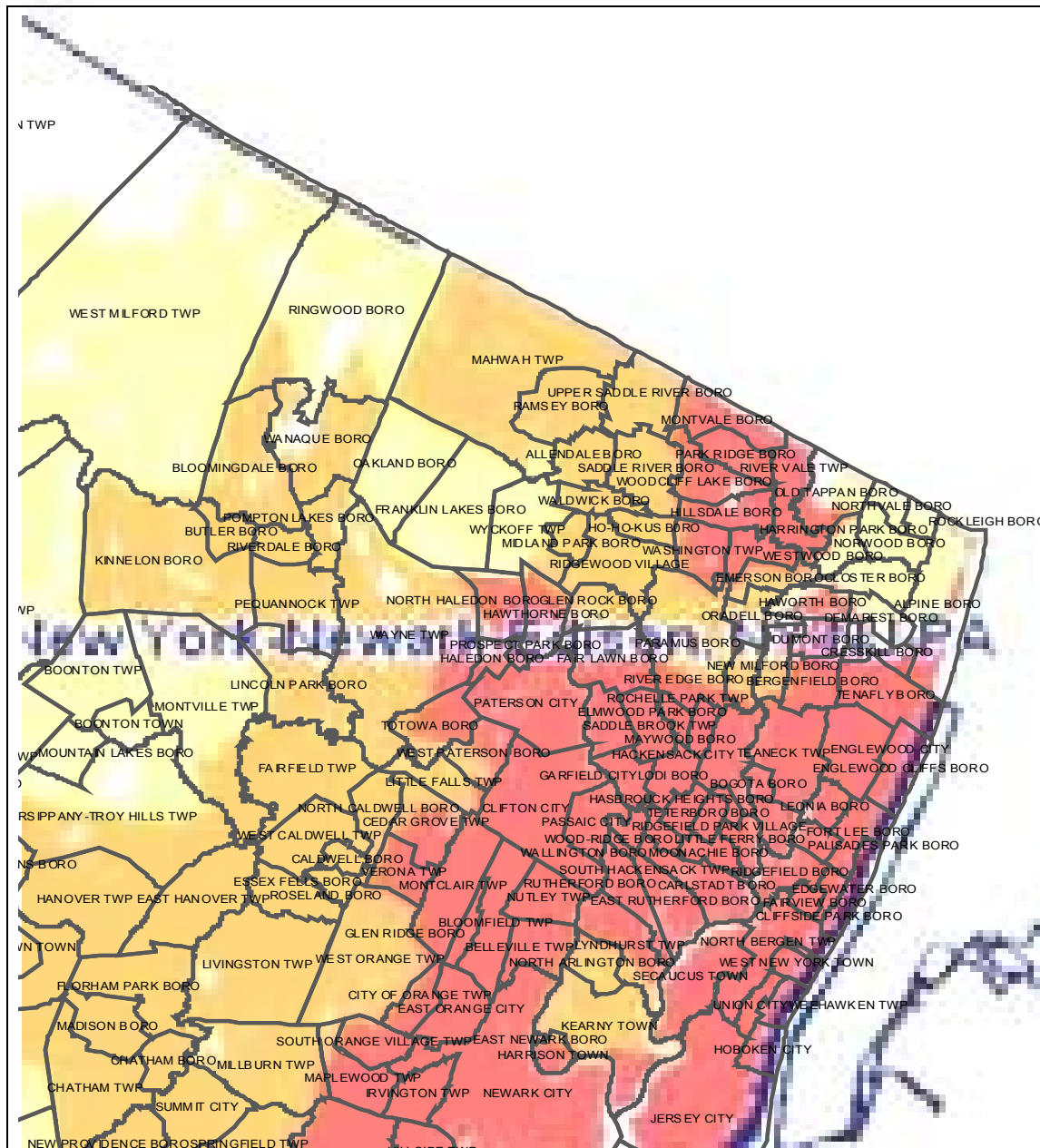
VERIZON NEW JERSEY INC.  
BPU DOCKET NO. TO03090705  
RPA REQUEST #RPA-TRO-101  
WITNESS: VERIZON NEW JERSEY INC.  
PAGE 1 OF 1

REQUEST: Please provide another version of this map that, for the areas that are presently colored as dark and light orange, displays the Verizon wire center boundaries with color coding corresponding to the following categories (a) zero self-provisioning CLECs; (b) one self-provisioning CLEC; (c) two self-provisioning CLECs; (d) three or more self-provisioning CLECs. Provide the workpapers.

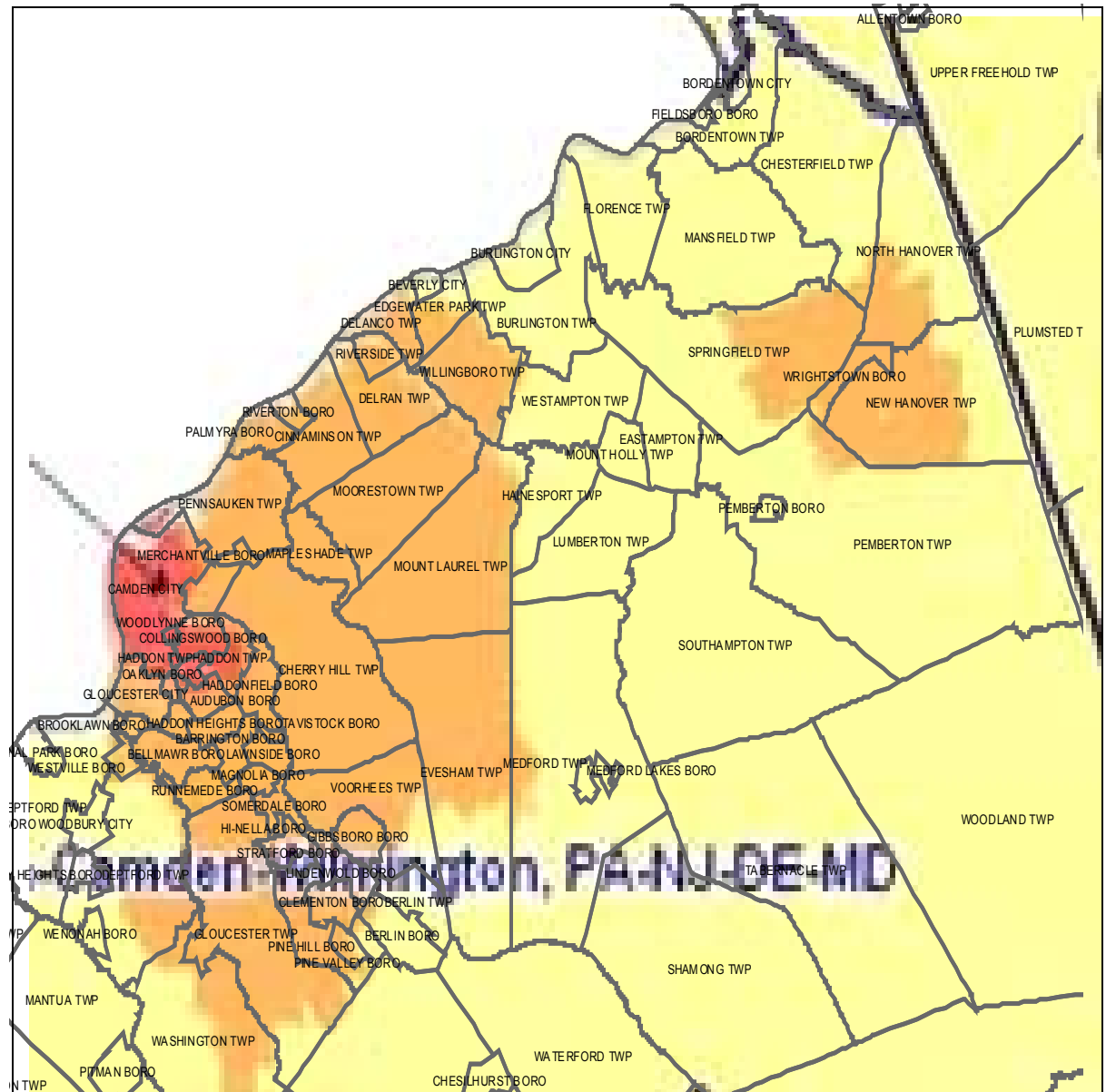
RESPONSE: Verizon objects to this request as overly broad and unduly burdensome to the extent that it purports to have Verizon create maps for RPA. Verizon has provided RPA with the wire center level breakdown for the Line Count Study.

# Attachment SMB-6 Anomalies in Verizon NJ's Proposed "Relief" Area Newark MSA

*sources: West/Peduto Direct,  
Attachment 3; NJ DEP GIS*



*sources: West/Peduto Direct,  
Attachment 3; NJ DEP GIS*



**Attachment SMB-8**

**Excerpt of the Ratepayer Advocate Data Requests**

**NJ BPU Docket No. T003090705**



**New Jersey Board of Public Utilities  
Division of Telecommunications  
Docket No. TO03090705  
Implementation of the FCC's  
Triennial Review Order**

**Division of Ratepayer Advocate's First Set of Data and Information Requests**

**SELECTED DATA AND INFORMATION REQUESTS**

**General instructions:**

Please indicate the name, e-mail address and phone number of the person in your company responsible for responding to these questions. If your company has no relevant facilities, please send a letter indicating such, unless such a letter has already been provided in response to Staff data requests. Cable television companies that provide no qualifying telecommunications services in New Jersey should indicate such in a letter, unless such a letter has already been provided to Staff data requests. Independent local exchange carriers should respond to these information requests if they provide relevant service in Verizon's service territory.

A packet switch that could be used to provide voice services (e.g., voice over IP) should be included. Those facilities that are strictly associated with wireless messaging services should be excluded.

**SWITCHING QUESTIONS**

These questions supplement switching questions 1 through 20 issued by Staff. The responses to RPA questions 1-6, 8, and 11 should be provided in a separate electronic spreadsheet, with the switches listed in the same order as they are listed in response to Staff's questions 1 through 20. Please note that there are two worksheets in the attached electronic file. The first worksheet is for questions 1 through 6 and 8. The second worksheet is for question 11. As needed, please supplement the responses provided in the spreadsheet with any additional information relevant to the information requests that may not conform to the parameters of the spreadsheet.

These questions concern each New Jersey State switching entity that your company has self-provisioned to provide service either to your company's New Jersey retail customers and/or to other carrier(s) to provide service to their New Jersey retail customers.

Please include as the first column the 11-digit COMMON LANGUAGE® Location Identifier (CLLI™) of each switch used to provide qualifying service anywhere in the State of New Jersey. Please provide the information electronically and in printed format. The questions request information to be provided on switch-specific basis (and, in some instances, on a Verizon wire center basis). Please also provide statewide totals for each of the questions, where applicable.

RPA-1. For each switch identified, provide a list of all the Verizon wire centers in New Jersey in which your company is currently using that switch to provide local service to one or more customers.

RPA-2. Identify the total number of voice-grade equivalent lines your company is providing to customers in each of the wire centers identified in your response to the previous question. If information is not available separately by Verizon wire center, provide the information by CLLI code.

RPA-3. With respect to the voice-grade equivalent lines identified in the previous response, separately indicate the number of lines being provided to:

- a) Residential locations (in this response, also indicate the number of locations)
- b) Business locations, one line
- c) Business locations, two lines
- d) Business locations, three lines
- e) Business locations, four lines
- f) Business locations, five up to and including 18 lines (in this response, also indicate the number of locations)
- g) Business locations, 19 or more lines (in this response, also indicate the number of locations)

RPA-4. For each switch identified, indicate the quantities of lines provided to other carriers to provide service to their retail customers.

RPA-5. For each switch identified, indicate the number of carriers that use your switch to provide service to their retail customers.

RPA-12. Please indicate the first date that your company provided service to a retail customer in New Jersey using a self-provisioned switch.

RPA-13. Please indicate the first date that your company provided service to another carrier in New Jersey using your company's self-provisioned switch.

RPA-14. Where not otherwise specified, please indicate the date that corresponds with the information provided in response to the questions above (for example, data on numbers of lines served might be current as of October 30, 2003).

RPA-16. Please provide updates to the information provided in response to the previous questions and to Staff's questions 1 through 20. Specifically, provide revisions based on the most recent information available to your company as follows, and indicate, in the revised responses, the date that corresponds with the information provided:

- a) Information available to your company as of January 15, 2004;
- b) Further updates as required under the OAL rules.

## Verizon NJ's Proposed TRO Relief Area

Newark MSA		
Location Name	Wire Center	Density Zone
Bayonne	BYNNNJ02	1
Belleville	BLVLNJBE	1
Bergen	JRCYNJBR	1
Bloomfield	BLFDNJBL	1
Cliffside	CFPKNJCS	1
Clifton	CFTNNJCF	1
Dumont	DUMTNJDM	1
East Orange	EORNNJEO	1
Elizabeth	ELZBNJEL	1
Englewood	ENWDNJEN	1
Essex	IVTNNJES	1
Fair Lawn	FRLNNJFL	1
Hackensack	HCKNNJHK	1
Haledon	HLDNNJ01	1
Humboldt	NWRKNJ03	1
Ironbound	NWRKNJIR	1
Journal Square	JRCYNJJO	1
Leonia	FTLENJLE	1
Linden	LNDNNJ01	1
Little Ferry	LTFYNJLF	1
Market	NWRKNJ02	1
Montclair	MTCLNJMC	1
North Bergen	NBRGNJNB	1
Nutley	NTLYNJNU	1
Passaic	PSSCNJPS	1
Paterson	PTSNNJAR	1
Rochelle Park	RCPKNJ02	1
Roselle	RSLLNJRL	1
Rutherford	RTFRNJRU	1
South Orange	SORGNJSO	1
Union City	UNCYNJ02	1
Unionville	UNINNJUV	1
Waverly	NWRKNJWA	1
Westwood	HLDLNJWE	1
Asbury Park	ASPKNJAP	2
Bound Brook	BDBKNJBD	2
Browntown	BWTWNJBT	2
Caldwell	CLWLNJCW	2
Carteret	CARTNJCA	2
Cranford	CNFRNJCR	2
Dunellen	DNLNNJDU	2
East Dover	EDVRNJ01	2
Edison	EDSNNJED	2
Fairfield	FRFDNJFA	2

Location Name	Wire Center	Density Zone
Fords	FRDSNJFR	2
Herbertsville	HBVLNJ01	2
Keansburg	KNBGNJKE	2
Kearny	KRNYNJKN	2
Keyport	KYPTNJKY	2
Little Falls	LTFLNJLF	2
Livingston	LVTNNJLI	2
Long Branch	LGBRNJLB	2
Madison	MDSNNJMA	2
Metuchen	MTCHNJMT	2
Middletown	MDTWNJMD	2
Millburn	MLBNNJMB	2
Morristown	MRTWNJMR	2
Mountain View	MTVWNJMV	2
Murray Hill	NWPVNJMH	2
Neptune	NPTUNJNT	2
New Brunswick	NBWKNJNB	2
Oradell	RVEDNJOR	2
Perth Amboy	PAMBNJPM	2
Piscataway	PSWYNJPI	2
Plainfield	PLFDNJPF	2
Point Pleasant	PTPLNJPP	2
Pompton Lakes	RVDLNJPL	2
Rahway	RHWYNJRA	2
Ramsey	RMSYNJRM	2
Red Bank	RDBKNJRB	2
Ridgewood	RGWDNJRW	2
South Amboy	SYRVNJSA	2
South River	SORVNJSR	2
Spring Lake	SPLKNJSL	2
Summit	SMMTNJSM	2
Wall Township	MNSQNJ01	2
West Orange	WORNNJWO	2
West Osbornville	WOVLNJWO	2
Westfield	WSFDNJWS	2
Whippany	WHIPNJWH	2
Woodbridge	WDBRNJWD	2

<b>Camden MSA</b>		
<b>Location Name</b>	<b>Wire Center</b>	<b>Density Zone</b>
Collingswood	CLWDNJCW	1
Camden	CMDNNJCE	1
Blackwood	BKWDNJBW	2
Riverton	CNMNNJRT	2
Cherry Hill	CRHLNJCH	2
Gloucester	GLCYNJGL	2
Haddonfield	HDFDNJHD	2
Laurel Springs	LRSPNJLS	2
Marlton	MARLNJMA	2
Merchantville	MHVLNJME	2
Moorestown	MSTWNJMO	2
Beaver Brook	RNMDNJBK	2
Riverside	RVSDNJRS	2
Willingboro	WLBONJWB	2
Fort Dix	WRTWNJFD	2

Sources: Verizon response to RPA 2-92. NJ BPU Docket No. TO03090705.

### Retail and Wholesale Lines in Newark and Camden MSAs, Sorted by Counties

[illegible]

**REDACTED – FOR PUBLIC INSPECTION**

Location	CLLI	County	UNE Density Zone	Retail Access Lines	Wholesale Switched Access Lines	Retail - Residence Lines	Retail - Business Lines	TRO Mass Market Relief Area

REDACTED – FOR PUBLIC INSPECTION









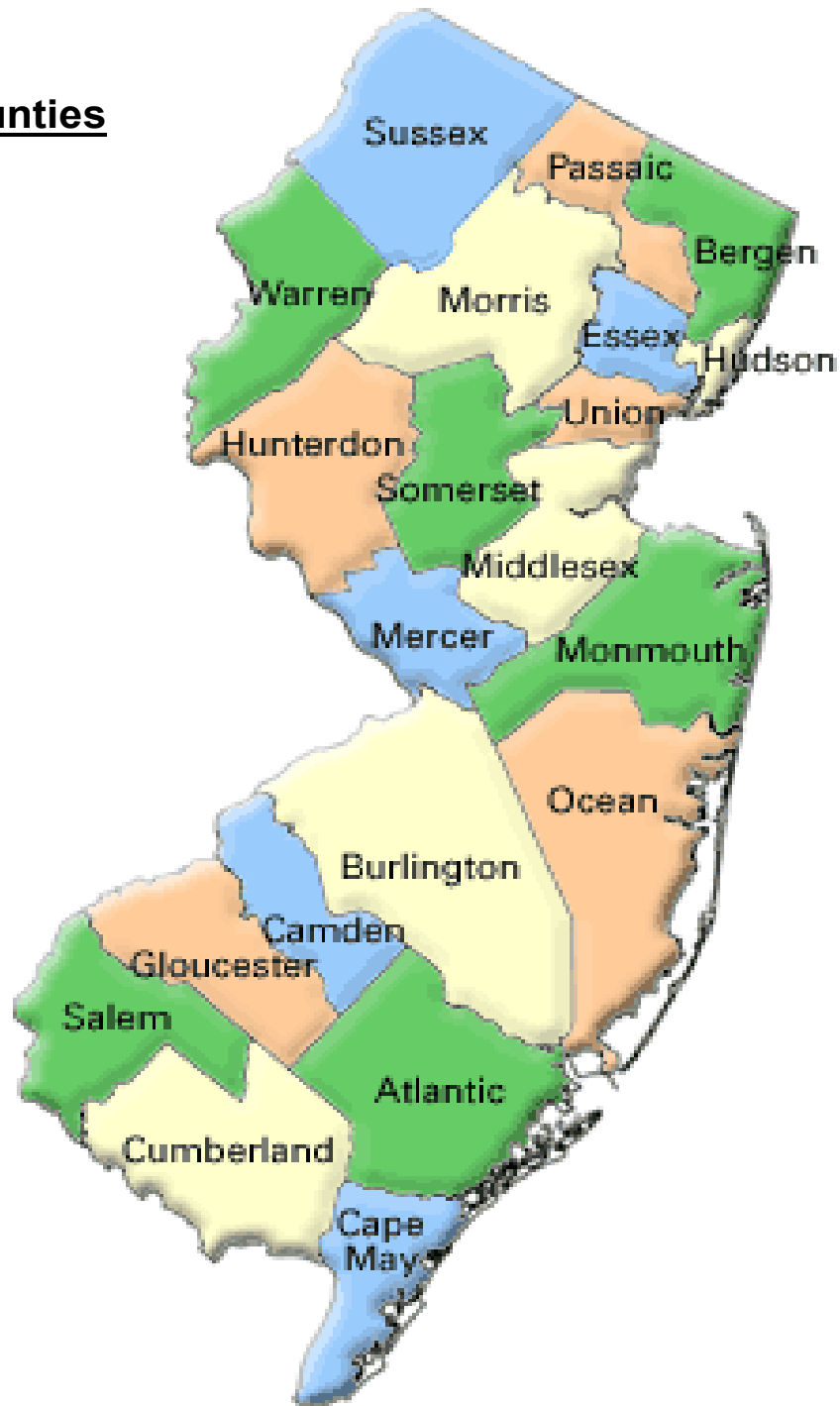
<b>Location</b>	<b>CLLI</b>	<b>County</b>	<b>UNE Density Zone</b>	<b>Retail Access Lines</b>	<b>Wholesale Switched Access Lines</b>	<b>Retail - Residence Lines</b>	<b>Retail - Business Lines</b>	<b>TRO Mass Market Relief Area</b>
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[REDACTED]

Sources: Verizon response to RPA 2-93. NJ BPU Docket No. TO03090705.

## New Jersey Counties

### NJ Counties



Sources: <http://www.rce.rutgers.edu/images/maps/nj-counties.gif> . NJ BPU Docket No. TO03090705.

## UNE-P Deployment in Newark and Camden MSAs

Wire Centers in Density Zones 1 and 2				
Wire Center	Location	A	B	C
		UNE-P	Total Lines in Wire Center	UNE-P as % of Total Lines

Wire Center	Location	UNE-P	Total Lines in Wire Center	UNE-P as % of Total Lines

[illegible]

[illegible]

**Subtotals by region:**

UNE-P lines	Total Lines	% UNE-P
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### In Density Zones 1 and 2

### In Density Zone 3

Sources: Column A: Verizon response to RPA 2-97. Column B: Verizon responses to RPA 2-93 and 2-96. Column C: calculated. NJ BPU Docket No. TO03090705.



## **Mass Market Local Competition in Verizon NJ's Wire Centers Is Entirely UNE-P-Based**

### **Newark MSA**

<b>Wire Center</b>	<b>Location Name</b>	<b>UNE-P Lines</b>
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### **Camden MSA**

<b>Wire Center</b>	<b>Location Name</b>	<b>UNE-P Lines</b>
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Total UNE-P Lines \_\_\_\_\_

Note: Of the 96 wire centers comprising verizon NJ's non-impairment markets, nearly \_\_\_\_ have no UNE-Loop activity.

Sources: Verizon responses to RPA 2-92, 2-96, and 2-97. NJ BPU Docket No. TO03090705.

**UNE-Loop Presence Is Negligible or Non-Existent in Many Wire Centers in  
Verizon NJ's Proposed Non-Impairment Region**

Newark MSA		Number of Unbundled Analog Loops Where the Total Unbundled Analog Loops at each Address is in the Specified Range							Total Loops
Wire Center	Location Name	1-3 Loops	4-8 Loops	9-12 Loops	13-16 Loops	17-20 Loops	21-24 Loops	> 24 Loops	

[illegible]

Number of Unbundled Analog Loops Where the Total Unbundled Analog Loops at each Address is in the Specified Range									
Wire Center	Location Name	1-3 Loops	4-8 Loops	9-12 Loops	13-16 Loops	17-20 Loops	21-24 Loops	> 24 Loops	Total Loops

**Camden MSA**

**Number of Unbundled Analog Loops Where the Total Unbundled Analog Loops at each Address is in  
 the Specified Range**

Wire Center	Location Name	1-3 Loops	4-8 Loops	9-12 Loops	13-16 Loops	17-20 Loops	21-24 Loops	> 24 Loops	Total Loops
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Totals

Sources: NJ BPU Docket No. TO03090705. Verizon responses to RPA 2-92 and RPA 2-104.

Note: \_\_ of the 96 wire centers in Verizon NJ's proposed non-impairment markets have no UNE-Loops; \_\_ wire centers have between 1 and 10 UNE-Loops; \_\_ wire centers have more than 10 and fewer than 100 UNE-Loops; \_\_ wire centers have 100 or more UNE-Loops.

**UNE-Loop Presence Is Negligible or Non-Existent in Many Wire Centers in  
Verizon NJ's Proposed Non-Impairment Region: Sorted by County**

Newark MSA			Number of Unbundled Analog Loops Where the Total Unbundled Analog Loops at each Address is in the Specified Range							Total Loops
County	Wire Center	Location Name	1-3 Loops	4-8 Loops	9-12 Loops	13-16 Loops	17-20 Loops	21-24 Loops	> 24 Loops	

[illegible]

Number of Unbundled Analog Loops Where the Total Unbundled Analog Loops at each Address is in the Specified Range										
County	Wire Center	Location Name	1-3 Loops	4-8 Loops	9-12 Loops	13-16 Loops	17-20 Loops	21-24 Loops	> 24 Loops	Total Loops



**Camden MSA**

**Number of Unbundled Analog Loops Where the Total Unbundled Analog Loops at each Address is in  
 the Specified Range**

County	Wire Center	Location Name	1-3 Loops	4-8 Loops	9-12 Loops	13-16 Loops	17-20 Loops	21-24 Loops	> 24 Loops	Total Loops
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Totals

Sources: Verizon responses to RPA 2-92 and RPA 2-104. NJ BPU Docket No. TO03090705.

Note: \_\_\_ of the 96 wire centers in Verizon NJ's proposed non-impairment markets have no UNE-Loops; \_\_\_ wire centers have between 1 and 10 loops; and \_\_\_ wire centers have more than 10 and fewer than 100 UNE-Loops.

**Residential Customers Rely on CLECs' UNE-P Based Entry For  
Competitive Choice**

Wire Centers in Density Zones 1 and 2 - Newark MSA			
Wire Center	A	B	C
	UNE-P Residential	Verizon Retail Residential	UNE-P as a Percentage of Total



Wire Center	UNE-P Residential	Verizon Retail Residential	UNE-P as a Percentage of Total
Total			

Wire Centers in Density Zones 1 and 2 - Camden MSA			
Wire Center	UNE-P Residential	Verizon Retail Residential	UNE-P as a Percentage of Total
Total			
Wire Centers in Density Zone 3 - Camden MSA			
Total			
Totals by Proposed Verizon NJ Non-Impairment Status MSAs Combined			
	UNE-P	Verizon Retail	% UNE-P
Density Zones 1 and 2			
Density Zone 3			
Sources: Column A: Verizon response to Joint Parties 1-2. Column B: Verizon response to RPA 2-93. Column C: calculated. NJ BPU Docket No. TO03090705.			

**Most of the CLECs in the Line Count Study Do Not Provide UNE-  
 Loop-Based Service to the Entire Mass Market**

<u>CLEC</u>	<u>Residential and Business Service</u>	<u>UNE-Loops</u>	
		<u>Total</u>	<u>Residential</u>
Total UNE-Loops to Residences			
Sources: Columns A and C: CLEC responses to RPA-3. Column B: Verizon response to RPA 2-96, CLEC response to RPA-3. NJ BPU Docket No. TO03090705.			
Notes: <i>Proprietary.</i>			

**Few Residential Customers in Verizon NJ's Proposed  
Non-Impairment Markets Are Served by Self-Provisioning CLECs**

New York-Newark-Edison, NY-NJ-PA Metropolitan Statistical Area				
		A	B	C
		Mass Market UNE-Loops		
Wire Center	Location	Total Verizon Retail Residential Lines	Residential	Total

Wire Center	Location	Total Verizon Retail Residential Lines	Mass Market UNE-Loops	
			Residential	Total



**Philadelphia-Camden-Wilmington, PA-NJ-DE-MD Metropolitan Statistical Area**

<b>Wire Center</b>	<b>Location</b>	<b>Mass Market UNE-Loops</b>		
		<b>Total Verizon Retail Residential Lines</b>	<b>Residential</b>	<b>Total</b>
Totals				

Sources: Wire Centers: Verizon response to RPA 2-92. Column A: Verizon response to RPA 2-93. Column B: CLEC responses to RPA 3. Column C: Verizon Response to RPA 2-104. NJ BPU Docket No. TO03090705.

Note: \_\_\_\_\_ reports serving \_\_\_\_ residential customers through UNE-Loop, but does not specify where in NJ those customers are located.

## The Vast Majority of UNE Loops Reported by CLECs Serve Large Business Customers

CLEC	Total VGE Lines	Lines to Residential Locations	Lines to Business Locations, One Line	Lines to Business Locations, Two Lines	Lines to Business Locations, Three Lines	Lines to Business Locations, Four Lines	Lines to Business Locations, 5- 18 Lines	Lines to Business Locations, 19 or More Lines
Allegiance	30,597	0	983	1,808	2,946	2,364	15,634	6,862

[REDACTED]

[REDACTED]

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Total

Sources: CLECs responses to RPA-1, RPA-2, RPA-3, and BPU Staff Switching Questions. NJ BPU Docket No. TO03090705.

Notes: 1) "NA" - "not available." The CLEC did not report the requested information in detail. 2) In one case, the reported total differs from the calculated totals. (\_\_\_\_) In addition, reported totals in response to BPU discovery differed slightly from reported totals for RPA discovery for \_\_\_\_ and \_\_\_\_.

### DS0 Lines Served Through Self-Provisioned Switches by CLECs Serving Both Residential *and* Business Markets

[illegible]

[illegible]

[illegible]

[illegible]

CLEC 1					CLEC 2				
Bus., Bus., Bus., 1-3 4-18 19+ Total					Bus., Bus., Bus., 1-3 4-18 19+ Total				
<u>Res. Lines</u>	<u>Lines</u>	<u>Lines</u>	<u>Lines</u>	<u>Lines</u>	<u>Res. Lines</u>	<u>Lines</u>	<u>Lines</u>	<u>Lines</u>	<u>Lines</u>
DZ 1 & 2									
DZ 3									

Sources: Verizon responses to RPA 2-93 and 2-97; CLECs' responses to RPA discovery. NJ BPU Docket No. TO03090705.

Note: Several wire centers serviced by \_\_\_\_ are not listed as part of Verizon's New Jersey territory.

## Most Alleged CLEC Activity Should Be Excluded From Trigger Analysis Accounting

[illegible]







[illegible]

<u>Location</u>	<u>CLLI</u>	<u>CLEC</u>	<u>Verizon Line Count</u>	<u>CLEC- Reported Lines</u>	<u>Reason to Exclude</u>
[REDACTED]					
[REDACTED]					
[REDACTED]					
[REDACTED]					
[REDACTED]					

Location	CLLI	CLEC	Verizon Line Count	CLEC- Reported Lines	Reason to Exclude
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### Newark MSA - Density Zone 2

[illegible]

<u>Location</u>	<u>CLLI</u>	<u>CLEC</u>	<u>Verizon Line Count</u>	<u>CLEC- Reported Lines</u>	<u>Reason to Exclude</u>
					
					
					
					

Location	CLLI	CLEC	Verizon Line Count	CLEC- Reported Lines	Reason to Exclude
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\_\_\_\_\_

c - CLEC does not provide evidence of providing service to actual customers.

**Despite the Presence of Three or More Self-Provisioning CLECs, the  
Self-Provisioning Trigger Is Not Met in Any Wire Center -  
At Least Three CLECs Do Not Serve the Entire Mass Market**

<b>CLLI</b>	<b>Location</b>	<b>CLECs</b>	<b>Residential and Small Business</b>
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Sources: Verizon Supplemental Testimony Attachment 1. CLECs responses to RPA 3. NJ  
BPU Docket No. TO03090705.